

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, Nevada Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Boulevard, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 DEUTSCHE BANK NATIONAL TRUST
28 COMPANY AS TRUSTEE FOR THE
29 CERTIFICATEHOLDERS OF THE
30 MORGANSTANLEY ABS CAPITAL I
31 INC. TRUST 2003-NC10 MORTGAGE
32 PASS-THROUGH CERTIFICATES,
33 SERIES 2003-NC10,

34 Plaintiff,

35 vs.

36 FIDELITY NATIONAL TITLE GROUP,
37 INC., et al.,

38 Defendants.

Case No.: 2:20-cv-02268-JCM-VCF

**STIPULATION AND
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 9] AND MOTION FOR FEES AND
COSTS [ECF No. 10]**

(Third Request)

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Deutsche Bank National Trust Company as Trustee for the Certificate holders of the Morgan Stanley ABS Capital I Inc. Trust 2003-NC10, Mortgage Pass-Through Certificates, Series 2003-NC10 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On December 15, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-20-826490-C [ECF No. 1-1];
2. On December 15, 2020, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On January 14, 2021, Deutsche Bank filed a Motion for Remand [ECF No. 9];
4. On January 14, 2021, Deutsche Bank filed a Motion for Costs and Fees [ECF No. 10];
5. Chicago Title’s deadline to respond to Deutsche Bank’s Motion for Remand and Motion for Costs and Fees was January 28, 2021;
6. On January 22, 2021, Chicago Title filed a Stipulation and Proposed Order requesting until Thursday, February 11, 2021 to file a response to the pending Motion for Remand and Motion for Costs and Fees [ECF No. 11];
7. On January 25, 2021, the Court granted Chicago Title’s request and ordered Chicago Title’s deadline to respond to Deutsche Bank’s Motion for Remand and Motion for Costs and Fees to be extended through and including February 11, 2021 [ECF No. 12];
8. On February 8, 2021, Chicago Title filed a second Stipulation and Proposed Order requesting until Thursday, February 25, 2021 to file a response to the pending Motion for Remand and Motion for Costs and Fees [ECF No. 19];
9. On February 10, 2021, the Court granted Chicago Title’s request and ordered Chicago Title’s deadline to respond to Deutsche Bank’s Motion for Remand and Motion for Costs and Fees to be extended through and including February 25, 2021 [ECF No. 20];
10. Chicago Title’s counsel is requesting an extension until Thursday, March 18, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
11. Chicago Title requests an extension of time to respond to the Motion for Remand and

Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in Deutsche Bank's motions;

12. Deutsche Bank does not oppose the requested extension;

13. This is the third request for an extension which is made in good faith and not for purposes of delay;

IT IS SO STIPULATED that Chicago Title's deadline to respond to Deutsche Bank's Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended through and including March 18, 2021.

Dated: February 24, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

Dated: February 24, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

Dated: February 24, 2021

WRIGHT FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner
DARREN T. BRENNER
Attorneys for Plaintiff DEUTSCHE BANK
TRUST COMPANY

IT IS SO ORDERED:

Dated: February 26, 2021

By: [Signature]
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

